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5
6 UNITED STATES DISTRICT COURT
7 NORTHERN DISTRICT OF CALIFORNIA

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9 UNITED STATES OF AMERICA,
10

Plaintiff,

11 vs.

12 SHANNON BLAYLOCK, et al.,

13 Defendant
14

) No. CR 07-0454 PJH
)
)

) **DEFENDANT SHANNON BLAYLOCK'S**
) **PRETRIAL STATEMENT**
)

) Trial Date: September 15, 2008

) Pretrial Conference: August 27, 2008

) Hearing Time: 1:30 p.m.
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18 COMES NOW defendant Shannon Blaylock and submits the following pretrial conference
19 statement pursuant to N.D. Cal. Local Crim. Rule 17.1-1(b).
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21 **(1) Disclosure and contemplated use of statements or reports of witnesses under the Jencks**
Act, 18 U.S.C. § 3500, or FRCP 26.2.

22 None.

23 **(2) Disclosure and contemplated use of grand jury testimony of witnesses intended to be**
24 **called at the trial.**

25 Please see defendants' motion to compel grand jury testimony of alleged victim identified as
26 "V.S." in the indictment filed concurrently herewith.

27 **(3) Disclosure of exculpatory or other evidence favorable to the defendant on the issue of**
28 **guilt or punishment.**

Not applicable to defendant's disclosure obligations.

- (4) **Stipulation of facts which may be deemed proved at the trial without further proof by either party and limitation of witnesses.**

None at this time.

- (5) **Appointment by the Court of interpreters under FRCrimP 28.**

Not applicable.

- (6) **Dismissal of counts and elimination from the case of certain issues, e.g., insanity, alibi and statute of limitations.**

None.

- (7) **Joinder pursuant to FRCrimP 13 or the severance of trial as to any co-defendant.**

Not applicable.

- (8) **Identification of informers, use of lineup or other identification evidence and evidence of prior convictions of defendant or any witness, etc.**

Not applicable to defendant's disclosure obligations.

- (9) **Pretrial exchange of lists of witnesses intended to be called in person or by deposition to testify at trial, except those who may be called only for impeachment or rebuttal.**

Not applicable to defendant's disclosure obligations.

- (10) **Pretrial exchange of documents, exhibits, summaries, schedules, models or diagrams intended to be offered or used at trial, except materials that may be used only for impeachment or rebuttal.**

None at this time.

- (11) **Pretrial resolution of objections to exhibits or testimony to be offered at trial.**

Defendant has not been informed by the Government of what it intends to offer sufficient to respond to this item.

- (12) **Preparation of trial briefs on controverted points of law likely to arise at trial.**

See motions in limine filed concurrently herewith.

- (13) **Scheduling of the trial and of witnesses.**

Not applicable to defendant's disclosure obligations.

- (14) **Request to submit questionnaire for prospective jurors pursuant to Crim.. L.R. 24-1, voir dire questions, exercise of peremptory and cause challenges and jury instructions.**

See defendant's proposed voir dire questions and proposed jury instructions filed

1 concurrently herewith.

2 **(15) Any other matter which may tend to promote a fair and expeditious trial.**

3 None at this time.

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6 DATED: August 13, 2008

Respectfully submitted,

8 /s/ Michael Stepanian

9 By

Michael Stepanian
Attorney for Defendant
Shannon Blaylock